

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- v.

SHELLY WASHINGTON,

Defendant.

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:
:

SEALED INDICTMENT

20 Cr.

20 CRIM . 37

COUNT ONE
(Carjacking)

The Grand Jury charges:

1. On or about November 25, 2019, in the Southern District of New York, SHELLY WASHINGTON, the defendant, with the intent to cause death and serious bodily harm, knowingly took a motor vehicle that had been transported, shipped, and received in interstate and foreign commerce from the person and presence of another by force and violence and by intimidation, and did aid and abet the same, to wit, WASHINGTON participated in an armed carjacking of a victim ("Victim-1") in the vicinity of 3091 Webster Avenue in the Bronx, New York.

(Title 18, United States Code, Sections 2119 and 2.)

COUNT TWO
(Robbery Conspiracy)

The Grand Jury further charges:

2. On or about November 25, 2019, in the Southern District of New York, SHELLY WASHINGTON, the defendant, and

others known and unknown, knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and did aid and abet the same, to wit, WASHINGTON conspired to rob Victim-1 in the vicinity of 3091 Webster Avenue in the Bronx, New York.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT THREE
(Robbery)

The Grand Jury further charges:

3. On or about November 25, 2019, in the Southern District of New York, SHELLY WASHINGTON, the defendant, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and did aid and abet the same, to wit, WASHINGTON participated in an armed robbery of Victim-1 in the vicinity of 3091 Webster Avenue in the Bronx, New York.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT FOUR
(Firearms Offense)

The Grand Jury further charges:

4. On or about November 25, 2019, in the Southern District of New York, SHELLY WASHINGTON, the defendant, during and in relation to a crime of violence for which she may be prosecuted in a court of the United States, namely, the carjacking charged in Count One of this Indictment and the Hobbs Act robbery charged in Count Three of this Indictment, knowingly did use and carry a firearm, and in furtherance of such crime, did possess a firearm, which was brandished, and did aid and abet the same.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii),
and 2.)

FORFEITURE ALLEGATIONS

5. As a result of committing the offenses alleged in Counts Two and Three of this Indictment, SHELLY WASHINGTON, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

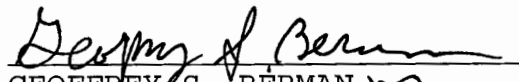

Substitute Assets Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


Foreperson


GEOFFREY S. BERMAN 
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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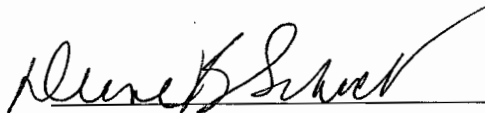
SHELLY WASHINGTON,

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(18 U.S.C. §§ 924(c), 1951, 2119 and 2)



Foreperson.

GEOFFREY S. BERMAN

U.S. Attorney.

01/15/20
(CA) SEALED INDICTMENT FILED
KH PARKER
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